

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**MOTION FOR ADMISSION TO PRACTICE,
PRO HAC VICE OF MICHAEL S. NEIBURG**

I, Michael S. Neiburg, request admission, *pro hac vice*, before the Honorable Judge Cecelia G. Morris, to represent Irving H. Picard, trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 7aaa et seq. (“SIPA”) and the estate of Bernard L. Madoff, in the above-referenced cases, as well as the following related adversary proceedings:

- *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC v. Caceis Bank Luxembourg et al.*, Adv. Pro. No. 11-02758 (CGM);
- *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC v. Crédit Agricole (Suisse) S.A. et al.*, Adv. Pro. No. 12-01022 (CGM);
- *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC v. Barfield Nominees Limited et al.*, Adv. Pro. No. 12-01669 (CGM);
- *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC v. Crédit Agricole Corporate and Investment Bank d/b/a Crédit Agricole Private Banking Miami, f/k/a Calyon S.A. d/b/a Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A. et al.*, Adv. Pro. No. 12-01670 (CGM); and

- *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC v. Intesa Sanpaolo SpA et al.*, Adv. Pro. No. 12-01680 (CGM).

I certify that I am a member in good standing of the bar of the State of Delaware and the bar of the U.S. District Court for the District of Delaware.

My address is:

Michael S. Neiburg
YOUNG CONAWAY STARGATT & TAYLOR, LLP
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mneiburg@ycst.com

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: March 2, 2022
New York, New York

/s/ Michael S. Neiburg

Michael S. Neiburg
YOUNG CONAWAY STARGATT &
TAYLOR, LLP
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mneiburg@ycst.com

Filed by:

/s/ Matthew B. Lunn

Matthew B. Lunn
YOUNG CONAWAY STARGATT & TAYLOR, LLP
1270 Avenue of the Americas
Suite 2210
New York, New York 10020
Telephone: (212) 332-8840
Facsimile: (212) 332-8855
Email: mlunn@ycst.com